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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Federal Trade Commission,
Plaintiff,
vs.
Superior Servicing, LLC, et
al., Defendants.

Case No.: 24-CV-2163

**PROPOSED STIPULATED SECOND
AMENDED DISCOVERY PLAN AND
SCHEDULING ORDER**

SPECIAL SCHEDULING REVIEW REQUESTED

On September 26, 2025, the Court issued an Amended Stipulated Discovery Plan and Scheduling Order (“Amended Discovery Plan”). (Dkt. 90) On October 2, 2025, the Court entered an order pursuant to the FTC and Defendant Dennise Merdjanian’s (collectively, “the Parties”) stipulation, staying all briefing, discovery, and other deadlines in the matter until “Congress has restored appropriations to the FTC” and extending all deadlines commensurate with the duration of the lapse of appropriations. (Dkt. 92) After the FTC received funding from Congress, counsel filed a Notice of Agency Funding. (Dkt. 93) In total, the lapse in funding lasted 44 days.

1 Consistent with and based on the foregoing, the parties submit below proposed amended deadlines for
2 this action:

3	FRCP 26(f); LR 26-1(b)	<u>Proposed Deadlines</u>
4	Initial Disclosures	September 25, 2025
5	Discovery Cut-Off:	April 16, 2026
6	Amending Pleadings/Adding Parties: 90 days before the close of discovery	January 16, 2026
7	Initial Expert Disclosures: 60 days before the close of discovery	February 15, 2026
9	Rebuttal Expert Disclosures: 30 days after the initial disclosure of experts	March 17, 2026
10	Dispositive Motions: 60 days after the close of discovery	June 15, 2026
12	Joint Pretrial Order: 30 days after the dispositive-motion deadline; pretrial disclosures and objections thereto must be included	July 15, 2026 (or 30 days after ruling on dispositive motions)

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17 IT IS SO ORDERED.
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Hon. Maximiliano D. Conville III

United States Magistrate Judge

DATED: 11-21-25

1 **FOR PLAINTIFF:**

2 **FEDERAL TRADE COMMISSION**

3 /s/ Luis H. Gallegos
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Date: November 19, 2025

7 **FOR DEFENDANT MERDJANIAN:**

8
9 /s/ Rowland Graff
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15 DENNISE MERDJANIAN

Date: November 19, 2025

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CERTIFICATE OF SERVICE

I, Luis H. Gallegos, hereby certify that I electronically filed the foregoing with the Court using CM/ECF.

Dated: November 19, 2025

/s/ Luis H. Gallegos

LUIS H. GALLEGOS
Attorney for Plaintiff
Federal Trade Commission

**SECOND AMENDED STIPULATED DISCOVERY PLAN
AND SCHEDULING ORDER**

SPECIAL SCHEDULING REVIEW REQUESTED